

EXHIBIT D



Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS

50 FOUNTAIN PLAZA, SUITE 1000 • BUFFALO, NY 14202-2293 • PHONE: 716.853.6161 • FAX: 716.853.6171

November 2, 2016

VIA E-MAIL (Danielle.rios@usdoj.gov)

and Facsimile (213) 894-2030

U.S. MARSHALS SERVICE – CENTRAL DISTRICT OF CALIFORNIA
Attn: Civil Process / Danielle Rios
350 W. 1st Street, Suite 3001
Los Angeles, CA 90012

Re: *Global BTG LLC v. National Air Cargo, Inc.*

- Case No. 2:11-cv-01657 1-14-12414 / U.S. District Court Central District of CA
- Our File No. 099788.000002

Dear Ms. Rios:

This letter is to follow up on my recent call with your office regarding a Notice of Levy in the above-referenced matter. As noted, we serve as bankruptcy counsel to the defendant, National Air Cargo, Inc. (“NAC”), who filed for Chapter 11 bankruptcy on October 17, 2014 (“Petition Date”). The case was filed with the U.S. Bankruptcy Court for the Western District of New York and assigned Case No. 1-14-12414-MJK.

The plaintiff, Global BTG LLC (“Global”), was within its rights to issue the pre-bankruptcy Notice of Levy on October 14, 2014. However, the automatic stay under the U.S. Bankruptcy Code went into effect on the Petition Date; thus, prohibiting “the enforcement, against the debtor *or against property of the estate*, of a judgment obtained before the commencement of the case under this title” – 11 U.S.C. § 362(a)(2).

The Notice of Levy was executed against one of NAC’s customers, ManTech International Corp. (“ManTech”), based on an outstanding receivable owed to NAC in the amount of \$95,100 – proof of which is attached hereto. The ManTech receivable is an asset of NAC’s bankruptcy estate and as such, U.S. bankruptcy law explicitly prohibits Global from collecting upon it. I have copied Global’s counsel on this letter, so they are aware of the situation.

Per the above, our office must request that the U.S. Marshals Service release the funds currently in its possession via check payable to “National Air Cargo Inc.” and delivered to my attention at the Buffalo office address listed below.

50 FOUNTAIN PLAZA, SUITE 1000 • BUFFALO, NY 14202-2293 • PHONE: 716.853.6161 • FAX: 716.853.6171
5549883_1 • ROCHESTER NY • BUFFALO, NY • ALBANY NY • CORNING NY • NEW YORK, NY

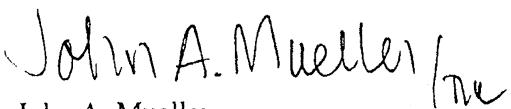
Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS

November 2, 2016
Page 2 of 2

Please contact me with any questions or concerns; otherwise, your office's cooperation in this matter is greatly appreciated.

Sincerely,

HARTER SECREST & EMERY LLP



John A. Mueller

DIRECT DIAL 716 844 3701
E-MAIL JMUELLER@HSELAW.COM

JAM:jam

Attachments/Enclosures

Cc: Donald J. Kula, Esq. (*via e-mail*)
Jeffrey S. Goodfried, Esq. (*via e-mail*)
Eric D. Danat (*via e-mail*)

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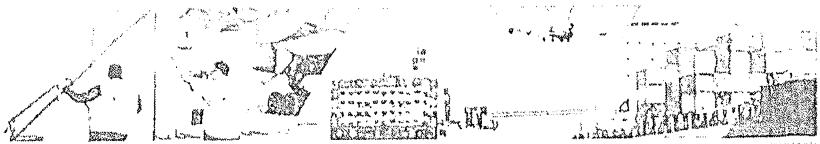
Case 1:14-cv-012414-MJK, Doc 710-4, Filed 04/17/17, Entered 04/17/17 14:50:32,
Description: Exhibit D, Page 3 of 7

National Air Cargo Middle East FZE

Customer aging report

Report date 10/3/2016, sorted by Document date

Account	Name	Balance as of		Past Due		
		10/3/2016		0 - 30 Days	31 - 60 Days	61 - 90 Days
MANTECH 300	ManTech International Co					
Document dt 0/27/2014	Voucher/Invoice 0092090GJE/930239154-01	Due Date 12/11/2014	\$95,100.00			
	Total due Percentages		95,100.00 100.00	0.00 0.00	0.00 0.00	0.00 0.00
	Report total		95,100.00	0.00	0.00	0.00
	Percentages		100.00	0.00	0.00	0.00

National Air Cargo, Inc.
350 Windward Drive
Orchard Park, NY 14217
UNITED STATES

Phone: 716-631-0011
Fax: 877-705-3689 / 716-677-2657

Invoice

Mantech International Co.,
2250 Corporate Park Drive
Suite #600
Herndon, VA 20171
UNITED STATES
TAX ID: 721527000

Invoice No.	Invoice Date
930239154-01	October 27, 2014
Customer No.	HAWB/Ref No.
MANT300	930239154



MANTECH SOCOM - KDH
Kandahar
KANDAHAR
AFGHANISTAN



MANTECH SOCOM
Bagram
Bagram/ManTech SOCOM Retrograde Yard
BAGRAM
AFGHANISTAN

SHIP DATE: August 06, 2014	TERMS: Due on Receipt	Cust Ref #:
PIECES: 20	DECLARED VALUE: NIL	ACTUAL WGT: 165,347 LB 75,000 KG
SERVICE LEVEL: STANDARD		CHARGEABLE WGT: 532,973 LB 241,753 KG
Due Date: October 28, 2014		

DESCRIPTION OF CHARGES	QUANTITY	RATE	AMOUNT
LAND TRANSPORT - 20ea_40ft Flatbed	20	\$4,755.00	\$95,100.00
NOTES:			
PLEASE PAY in USD			\$95,100.00

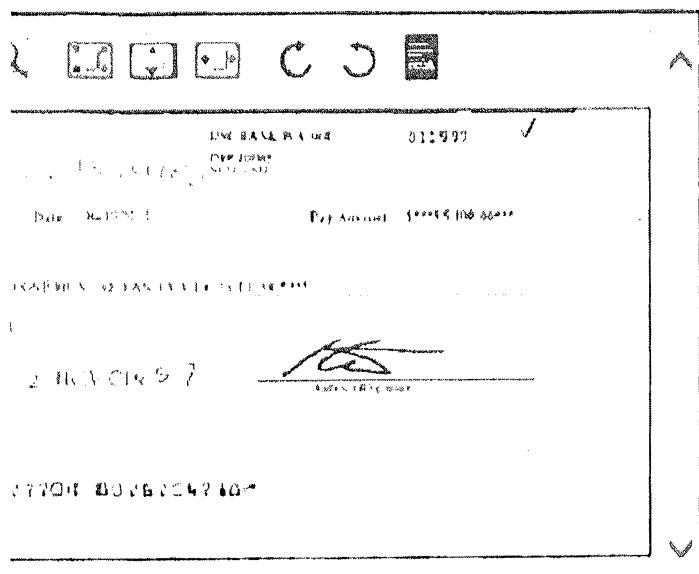
PLEASE REMIT TO:

National Air Cargo, Inc.
350 Windward Drive
Orchard Park, NY 14217
UNITED STATES

WIRING INSTRUCTIONS:

Wells Fargo Bank
ABA# 121000248
Acct# 4124524257
Acct Name: National Air Cargo, Inc.
Swift Code: WFBUS6S

As a reminder, our full terms and conditions are located at
www.nationalaircargo.com



File Edit View Format Tools Help

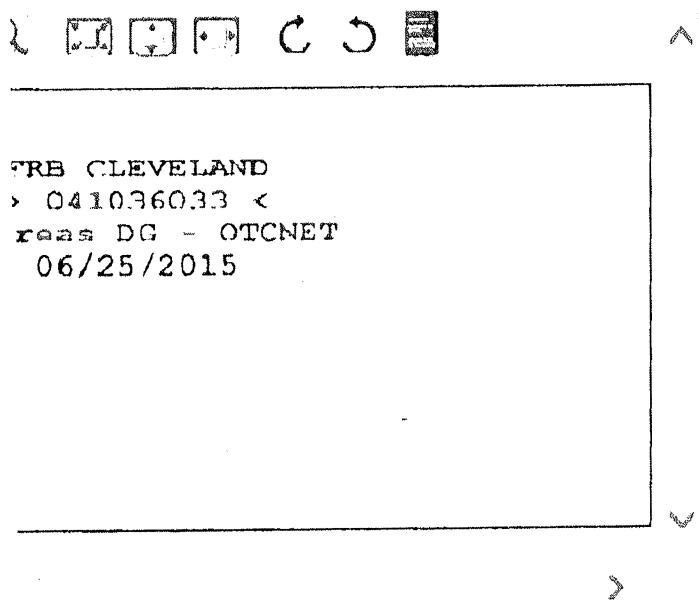
Last Update: 04/17/2017 File Name: 14-12414-MJK.DAT

Post Date	Account	Amount	Transaction Type	Seq/Ref#	Check #
06/26/2015	ManTech - AP	\$95.100.00	Checks/Debits	94288921	11997

2 HMC 11997 
MANTECH - AP

[Printer Friendly Version](#)

Account Number: 8026254718
Account Name: ManTech - AP
Post Date: 06/26/2015
Amount: \$95.100.00
Transaction Type: Checks/Debits
Seq/Ref#: 94288921
Check #: 11997



File Edit View Format Tools Help

Last Update: 04/17/2017 File Name: 14-12414-MJK.DAT

FRB CLEVELAND
041036033
reas DG - OTCNET
06/25/2015

Transmission Report

Date/Time 11-03-2016 10:26:00 a.m. Transmit Header Text
 Local ID 1 7168531617 Local Name 1 Harter Secrest & Emery LLP.

**This document : Confirmed
 (reduced sample and details below)
 Document size : 8.5" x11"**



November 2, 2016

VIA E-MAIL (Danielle.rios@usdoj.gov)
 and Facsimile (213) 894-2030
 U.S. MARSHALS SERVICE - CENTRAL DISTRICT OF CALIFORNIA
 Attn. Civil Process / Danielle Rios
 350 W 1st Street, Suite 3001
 Los Angeles, CA 90012

Re: *Global BTG LLC v. National Air Cargo, Inc.*
 Case No 2:11-cv-01657 1:14-12414 / U.S. District Court Central District of CA
 Our File No 0997XX.0000X02

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50 FOUNTAIN PLAZA, SUITE 1000, BUFFALO, NY 14202-2402, PHONE: 716.823.1010, FAX: 716.823.6112
 15498531617 100 FOUNTAIN PLAZA, SUITE 1000, BUFFALO, NY 14202-2402, PHONE: 716.823.1010, FAX: 716.823.6112
 15498531617 100 FOUNTAIN PLAZA, SUITE 1000, BUFFALO, NY 14202-2402, PHONE: 716.823.1010, FAX: 716.823.6112

Total Pages Scanned : 5

Total Pages Confirmed : 5

No.	Job	Remote Station	Start Time	Duration	Pages	Line	Mode	Job Type	Results
001	792	213-894-2030	10:24:14 a.m. 11-03-2016	00:01:04	5/5	1	EC	HS	CP24000

Abbreviations:

HS: Host send

PL: Polled local

MP: Mailbox print

CP: Completed

TS: Terminated by system

HR: Host receive

PR: Polled remote

RP: Report

FA: Fall

G3: Group 3

WS: Waiting send

MS: Mailbox save

FF: Fax Forward

TU: Terminated by user

EC: Error Correct

Case 1-14-12414-MJK, Doc 710-4, Filed 04/17/17, Entered 04/17/17 14:50:32,
 Description: Exhibit D, Page 7 of 7